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KENNISON WAKEFIELD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KENNISON WAKEFIELD, individually and on)
behalf of all other similarly situated,)

Plaintiff,)

v.)

WELLS FARGO & COMPANY, WELLS)
FARGO ADVISORS, LLC, and WELLS)
FARGO ADVISORS FINANCIAL NETWORK,)
LLC, and DOES 1 through 20,)

Defendants.)

Case No. C 13-05053

**DECLARATION OF SONY B. BARARI
IN SUPPORT OF PLAINTIFF
KENNISON WAKEFIELD'S MOTION
TO REMAND**

Date: February 6, 2014
Time: 9:30 a.m.
Courtroom: C, 15th Floor

The Hon. Magistrate Judge Laurel Beeler

I, SONY B. BARARI, hereby declare:

1. I am an associate in the law firm of Bartko, Zankel, Bunzel & Miller, a professional corporation, counsel of record for Plaintiff Kennison Wakefield ("Plaintiff") in the above-captioned action, and am admitted to practice law in the State of California and before this Court. The facts stated herein are true of my own knowledge, unless otherwise stated, and if called to testify I could and would testify competently to those facts. I submit this declaration in support of Plaintiff's motion to remand filed herewith.

2. Attached hereto as **Exhibit A** is a true and correct copy of the brochure titled “Private Client Group 2010 Financial Advisor Compensation Plan” for Wells Fargo Advisors.

3. Attached hereto as **Exhibit B** is a true and correct copy of the brochure titled “Private Client Group 2009 Financial Advisor Compensation Plan” for Wachovia Securities.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the sworn deposition testimony offered by Paula S. Roe, Wells Fargo’s Executive Vice President of Compensation and Benefits, taken October 4, 2007, in *In re Segovia*, 404 B.R. 896 (N.D.Cal. 2009), No. C-08-03075-PJH (Dkt. 6-1).

5. Attached hereto as **Exhibit D** are true and correct copies of the “Company Highlights” page from Wells Fargo Advisors’ website, from 2011, 2012, and 2013. I accessed the 2011 Company Highlights online at <http://web.archive.org/web/20111007202240/https://www.wellsfargoadvisors.com/about-wells-fargo-advisors/company-highlights.htm> on November 21, 2013. I accessed the 2012 Company Highlights online at <http://web.archive.org/web/20120906013416/https://www.wellsfargoadvisors.com/about-wells-fargo-advisors/company-highlights.htm> on November 21, 2013. I accessed the 2013 Company Highlights online at <https://www.wellsfargoadvisors.com/about-wells-fargo-advisors/company-highlights.htm> on November 21, 2013.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on November 26, 2013 in San Francisco, California

/s/ Sony B. Barari
Sony B. Barari

ATTESTATION OF E-FILER

In compliance with Local Rule 5-1(i), the undersigned ECF user filing this document, hereby attests that all signatories of this document have concurred in the filing of this document.

/s/ William I. Edlund
William I. Edlund